

Bent, Sara

From: Valdez, Heather
Sent: Wednesday, September 16, 2015 9:45 AM
To: Weigel, Greg
Subject: RE: RCRA Pond UAO Weekly Report #266 - September 7 to 13, 2015

Hi Greg, How are you? I have a couple questions about the current activities.

Where is the monitoring point for the 2000 ppm threshold, is that a value that represents the concentration in the standpipe of the perimeter pipe?

Where exactly are the monitoring points for the continuous monitoring at three Pond 18A boundary locations and four 15S boundary monitoring locations during periods of gas extraction?

Is the IWP referenced for Pond 18A the document dated March 8, 2013?

And the RIWP for pond 15S, that would be this document, 133. 2014-06-10 FMC Pond 15S Readily Implementable Work Plan, correct?

Do you have a copy of the 15S RIWP? I have not located that yet.

Thanks Greg

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From: Weigel, Greg
Sent: Wednesday, September 16, 2015 9:00 AM
To: kwright@shoshonebannocktribes.com; brian.english@deq.idaho.gov; susanh@ida.net; Valdez, Heather
Subject: FW: RCRA Pond UAO Weekly Report #266 - September 7 to 13, 2015

Folks,

Note in the 2nd bullet of "work to be performed," FMC plan to reduce mass removal at 15S by eliminating 1 GES unit at SW standpipe (going from 3 to 2) and reducing operating hours from 80 to 70 hours per week. I believe these are appropriate moves given continued downward trend of PH3 (now below 2,000 ppm) and pond management goal to continuously operate gas extraction and treatment within a steady state envelope between 2,000 and 5,000 ppm, rather than simply shutting down gas extraction once they get below 2,000 ppm.

Let me know if you have any questions. Thanks,

Greg Weigel
Federal On-Scene Coordinator
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950 W. Bannock Street, Boise, ID 83702

From: Rob Hartman [<mailto:Rob.J.Hartman@mwhglobal.com>]

Sent: Wednesday, September 16, 2015 9:34 AM

To: Weigel, Greg

Cc: Hastings, Janis; 'Kelly Wright'; susanh@ida.net; brian.english@deq.idaho.gov; Al Lam; Mark Smith; vannoyj@dhw.idaho.gov; Paden, Norka E - CO 6th; Williams, Jonathan; Marguerite Carpenter; Ross, Carrie; Valdez, Heather; Gary Resh; rachel.greengas@fmc.com

Subject: RCRA Pond UAO Weekly Report #266 - September 7 to 13, 2015

Greg,

As you had directed, FMC is providing a weekly report, pursuant to the RCRA Pond UAO, describing field activities conducted pursuant to work plans you have approved.

WEEKLY

Work Performed this week:

- Continued implementation of the IWP and, per the June monthly report, 7/8/15 conference call and EPA email approval, continue 80-hour per week operation of the extraction system at Pond 18A east standpipe.
- Continued implementation of the RIWP and, per the July monthly report and EPA verbal approval during the 8/10/15 monthly conference call, beginning on 8/11/15 continued extraction with three GES units extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from TMP #2 on an 80-hour per week operating schedule (for a total of five GES units operating at Pond 15S).
- Continued continuous monitoring at three Pond 18A boundary locations and four 15S boundary monitoring locations during periods of gas extraction. There were no TWA or maximum values above the thresholds specified in the Air Monitoring Plan. A spreadsheet summarizing the results of this monitoring to date is attached.
- In addition to continuous monitoring at Ponds 15S and 18A, monitoring performed pursuant to the approved work plans:
 - Pond 15S - Appurtenance monitoring and perimeter surface scan
 - Pond 16S - Appurtenance monitoring and perimeter surface scan
 - Pond 18A - Appurtenance monitoring and perimeter surface scan
- Participated in the monthly conference call to review the August data report on 9/9/15 at 1000 PDT / 1100 MDT / 1300 EDT.

Problems Encountered:

None.

Unplanned Events Encountered:

None.

Work to be performed the following week:

- Continue implementation of the IWP and, per the June monthly report, 7/8/15 conference call and EPA email approval, continue 80-hour per week operation of the extraction system at Pond 18A east standpipe. Per FMC verbal notification to EPA on 9/15/15, the Pond 18A east standpipe source gas concentration has decreased to

below 3,000 ppm and, consistent with the IWP, FMC plans to reduce the mass extraction rate at Pond 18A by reducing the operating hours to 70 hours per week beginning on 9/21/15.

- Continue implementation of the RIWP and, per the June monthly report, 7/8/15 conference call and EPA email approval, and EPA verbal approval during the 8/10/15 conference call, continue 80-hours per week operation at Pond 15S using three GES units extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from TMP #2 (for a total of five GES units operating at Pond 15S). Per FMC verbal notification to EPA on 9/15/15, the Pond 15S southwest standpipe average source gas concentration month-to-date is below 2,000 ppm and, consistent with the RIWP, FMC plans to reduce the mass extraction rate at Pond 15S by dropping from three to two GES units extracting from the southwest standpipe and reducing the operating hours of two GES units extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from TMP #2 (for a total of four GES units operating at Pond 15S) to 70 hours per week. The reduction to two GES units extracting from the southwest standpipe will begin on 9/17/15 and the reduction to 70-hour per week operation will begin on 9/21/15.
- Continue continuous monitoring at three Pond 18A boundary locations and four 15S boundary monitoring locations during periods of gas extraction.
- Other than continuous monitoring at Ponds 15S and 18A, no monitoring is planned or required pursuant to the approved work plans.